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FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JAN 27 4 27 PM '00

January 21, 2000

Mr. Scott Thomas
Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 4954
Amending Complaint

Dear Mr. Chairman:

Pursuant to 2 U.S.C. § 437g(a)(1), I am amending MUR 4954 to include the Rensselaer County Republican Committee, and am enclosing documents that I believe constitutes additional violations of the Federal Election Campaign Act of 1971, as amended ("FECA" or "Act").

The materials enclosed as evidence request that the recipient assist the Bush for President Committee in obtaining signatures on petitions for the Bush for President delegates and alternates to the 2000 Republican National Convention. The petitions attached also list names of candidates for delegate and the alternates and indicate that all are supporting George Bush.

The delegate materials were sent out on Rensselaer County Republican Committee letterhead and signed by the County Committee's Chairman, Mr. James A. Walsh. Please note also that the envelope in which it was sent has a return address of the Rensselaer County Republican Committee, P.O. Box 686, Troy, New York 12181 ("Delegate Materials").

The value of the printing and postage and the staff time of the Rensselaer County Republican Committee and/or its vendors and agents to prepare and mail the Delegate Materials constitutes an in-kind contribution to the Bush for President Committee, subject to the limits and prohibitions of the FECA.

The solicitation of signatures for delegate and alternate petitions clearly comes within the definition of an "election" as found in the FECA (2 U.S.C. § 431(1)(B) and (C)).

The funds expended and the value of goods and services spent to influence this election of George Bush for President constitutes a contribution to that committee (2 U.S.C. § 431(8)(A)(i) and (ii)).

The entire value of the printing, postage, and the value of the staff, equipment and facilities of the Rensselaer County Republican Committee or its agents or vendors, constitutes a contribution to the Bush for President Committee. It is subject to the contribution limits, specifically One Thousand Dollars (\$1,000.00) (2 U.S.C. § 441(a)).

In addition, since the campaign finance statutes for the State of New York permit corporate treasury funds to be contributed to state and county political committees, it is probable that all or a portion of the in-kind contribution referenced above was paid for from corporate or otherwise prohibited and excessive funds in the Rensselaer County Republican Committee (2 U.S.C. § 431(8)(A)(i) and § 431(a)(C)).

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In addition, the Delegate Materials fail to include a notice as to who paid for those materials and the postage. This constitutes a violation of 2 U.S.C. § 431(d).

I would request that the Commission undertake a finding of reason to believe that a violation of the FECA has occurred and conduct an appropriate investigation.

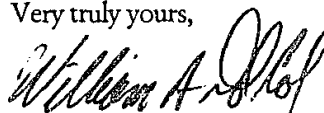
In addition, it is apparent that the resources of the Rensselaer County Republican Committee are being utilized for the delegate and alternate selection process. It is also likely that the resources and staff of the county committee are being used in other fashions to benefit and to influence the election of George W. Bush. The scope of the Commission's investigation should include and inquire of the county committee as to whether other party resources are being used to influence the election of George W. Bush.

It is apparent from this additional material that a pattern of violations using the New York State Republican Party apparatus to influence the Bush campaign is probably taking place. The instance involving the Ulster County and Rensselaer County Republican Committees are remarkably similar. Therefore, we respectfully request the FEC expand the scope of their investigation to include all county and state party organizations, to determine whether these are isolated incidents or part of a larger coordinated pattern.

In light of the immediate and irreparable injury to the candidacy of Steve Forbes, as well as other Republican presidential candidates opposing Mr. Bush, I would request that immediate action be taken by the Commission to investigate this matter and direct the Rensselaer County Republican Committee and other state and county committees to cease and desist from these violations of the FECA.

Upon completion of the Commission's investigation, I would request that appropriate remedies be undertaken in accordance with the FECA.

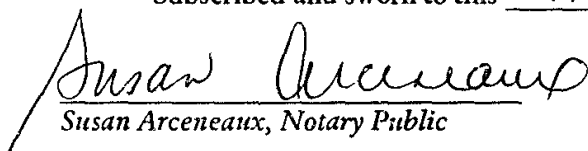
Very truly yours,



William A. Dal Col
President
Forbes 2000, Inc.

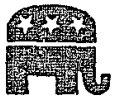
COUNTY OF FAIRFAX :
:
COMMONWEALTH OF VIRGINIA :

Subscribed and sworn to this 24th ^{January, 2000} day of ~~December, 1999~~.


Susan Arceneaux, Notary Public

My Commission Expires: June 30, 2003

[SEAL]



**Rensselaer
County
Republican
Committee**

JAMES A. WALSH, Chairman

MEMORANDUM


TO: City and Town Chair people, District Leaders
FROM: James A. Walsh, Chairman, Rensselaer County Republican Committee
SUBJECT: Bush Presidential petitions
DATE: December 1, 1999

As we approach the year 2000, we must begin preparing for the upcoming Presidential election. The first step in this process is the circulation of petitions. Headquarters has both George W. Bush petitions and convention delegate petitions. I am asking that you please distribute these to your committee people to be circulated and signed. The petitions will be due back December 21. Petition packets will be available to you or your representative at our open house, next Tuesday, December 7. If you or a designee can not be there on that date, it is imperative that you contact Lev Ginsburg at 272-2111 to make other arrangements. This is a very important undertaking at what I understand is a very difficult time of year. Your cooperation is very much appreciated.

Yours truly,

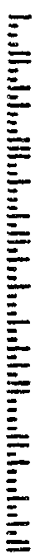
James A. Walsh




Rensselaer County
Republican Committee
P.O. Box 686
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